UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

V. Cr. No. 07-124-04T

KAREN LYNCH

MOTION TO CONTINUE SURRENDER DATE

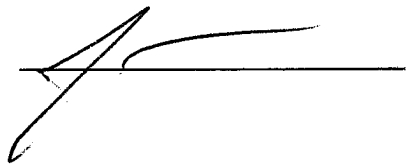
Now comes this Defendant, Karen Lynch, and moves that this Honorable Court continue the date set for her surrender for service of sentence, for the reason that Defendant "underwent spinal surgery on 4/3/08 for a significant lumbar spine neurologic problem," according to her orthopedic surgeon, Mark A Palumbo, MD of University Orthopedics. Defendant is presently scheduled to surrender on Monday, April 21, 2008; she has been designated to FCI Danbury.

Defendant requests, in accordance with the opinion of her orthopedic surgeon as set forth in the accompanying letter regarding the length of her anticipated recovery phase, that her surrender date be continued to Monday, May 19, 2008.

Counsel has conferred with AUSA Sandra Beckner regarding this request, and the Government has no objection thereto.

KAREN LYNCH
Defendant
By Her Attorney,

Judith Crowell, Esq. #1993
128 Dorrance Street
Fourth Floor
Providence, RI 02903
(401) 272-6600

CERTIFICATION

I hereby certify that on April 14, 2008, I hand-delivered a copy of this Motion to AUSA Sandra Beckner, 50 Kennedy Plaza, Eighth Floor, Providence, RI 02903.